

# Exhibit 6

Georgia Pacific's Responses to Defendant International  
Paper's First Set of Requests for Admission  
(January 31, 2012)

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

<b>GEORGIA-PACIFIC CONSUMER PRODUCTS LP,</b>	)	
<b>FORT JAMES CORPORATION, and</b>	)	
<b>GEORGIA-PACIFIC LLC</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>No: 1:11-cv-00483</b>
<b>v.</b>	)	
	)	<b>Judge Robert J. Jonker</b>
<b>NCR CORPORATION,</b>	)	
<b>INTERNATIONAL PAPER CO.,</b>	)	
<b>and WEYERHAEUSER CO.,</b>	)	
	)	
<b>Defendants.</b>	)	

**GEORGIA-PACIFIC'S RESPONSES TO DEFENDANT INTERNATIONAL PAPER'S FIRST SET OF REQUESTS FOR ADMISSION**

Plaintiffs, Georgia-Pacific Consumer Products LP, Fort James Corporation, and Georgia-Pacific LLC (collectively “Georgia-Pacific”), by counsel, submit these objections and responses to the First Set of Requests for Admissions from Defendant International Paper Company (“IP”).

**GENERAL OBJECTION**

1. Georgia-Pacific objects to definition of “you”, which is apparently a typographical error, as it defines “you” to mean the NCR Corporation. For the purposes of these responses, “you” will be interpreted to mean Plaintiffs.
2. Georgia-Pacific objects generally to list of terms and definitions, the vast majority of which are not used in these Requests.

**RESPONSES TO FIRST SET OF REQUESTS FOR ADMISSION**

1. Admit that you are presently unaware of any evidence that NCR broke and/or trim was reprocessed at the Bryant Mill specifically during the alleged operation period.

Answer: Denied.

2. Admit that you are presently unaware of any evidence that NCR broke and/or trim was reprocessed at the Bryant Mill specifically during the alleged lease period.

Answer: Denied.

3. Admit that you are presently unaware of any shipments of NCR broke and/or trim that the Bryant Mill received during the alleged operation period.

Answer: Georgia-Pacific objects to the phrase “unaware of any shipments” as being vague and ambiguous. To the extent that this Request asks Georgia-Pacific to admit that there were no shipments of NCR broke and/or trim to the Bryant Mill during the relevant time period, denied. To the extent that it asks Georgia-Pacific to admit that it does not have documentation of specific shipments on specific dates, admitted.

4. Admit that you are presently unaware of any shipments of NCR broke and/or trim to the Bryant Mill received during the alleged lease period.

Answer: Georgia-Pacific objects to the phrase “unaware of any shipments” as being vague and ambiguous. To the extent that this Request asks Georgia-Pacific to admit that there were no shipments of NCR broke and/or trim to the Bryant Mill during the relevant time period, denied. To the extent that it asks Georgia-Pacific to admit that it does not have documentation of specific shipments on specific dates, admitted.

Dated: January 31, 2012

**GEORGIA-PACIFIC CONSUMER PRODUCTS,  
LP., FORT JAMES CORPORATION, and  
GEORGIA-PACIFIC LLC**

By: /s/ Joseph C. Kearfott

Peter A. Smit, Bar No. P 27886  
Varnum LLP  
Bridgewater Place, P.O. Box 352  
Grand Rapids, MI 49501  
(616) 336-6000

Joseph C. Kearfott  
Douglas M. Garrou  
George P. Sibley, III  
Hunton & Williams LLP  
951 East Byrd St.  
Richmond, VA 23219  
(804) 788-8200

Jeffrey N. Martin  
Djordje Petkoski  
Hunton & Williams LLP  
2200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037-1701  
(202) 955-1500

Kathy Robb  
Hunton & Williams LLP  
200 Park Avenue, 52<sup>nd</sup> Floor  
New York, New York 10166-0005  
(212) 309-1000

Jan M. Conlin  
Tara D. Falsani  
Robins, Kaplan, Miller & Ciresi L.L.P.  
800 LaSalle Avenue  
2800 LaSalle Plaza  
Minneapolis, MN 55402  
(612) 349-8500

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2012, I caused to be served by electronic mail a copy of Georgia-Pacific's Responses to Defendant International Paper's First Set of Requests for Admission upon counsel for each Defendant, at the following e-mail addresses:

**Counsel for NCR Corporation:**

Evan R. Chesler	echesler@cravath.com
Geoffrey A. Fields	gfields@dickinsonwright.com
Sandra C. Goldstein	sgoldstein@cravath.com
Eric W. Ha	eha@sidley.com
Linda R Larson	llarson@martenlaw.com
Vanessa A. Lavelly	vlavelly@cravath.com
Meline Grace MacCurdy	mmaccurdy@martenlaw.com
Bradley M Marten	bmarten@martenlaw.com
Darin P. McAtee	dmcatee@cravath.com
Omid H. Nasab	onasab@cravath.com
Margaret R. Sobota	msobota@sidley.com
Evan B. Westerfield	evanwesterfield@sidley.com

**Counsel for International Paper Co.:**

John F. Cermak, Jr.	jcermak@bakerlaw.com
Sonja A. Inglin	singlin@bakerlaw.com
Michael Dominic Meuti	mmeuti@bakerlaw.com
John D. Parker	jparker@bakerlaw.com

**Counsel for Weyerhaeuser Co.:**

J. Christopher Baird	jcbaird@perkinscoie.com
Douglas A. Dozeman	ddozeman@wnj.com
Michael Dunning	mdunning@perkinscoie.com
Karen M. McGaffey	kmcgaffey@perkinscoie.com
Mark W. Schneider	mwschneider@perkinscoie.com
Scott M. Watson	swatson@wnj.com

By: /s/ Joseph C. Kefratt

**Barden, Sheila**

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**From:** Alexander, Gayle  
**Sent:** Tuesday, January 31, 2012 1:13 PM  
**To:** Chesler, Evan; Fields, Geoffrey; Goldstein, Sandra; Ha, Eric; Larson, Linda; Lively, Vanessa; MacCurdy, Meline; Marten, Bradley; McAtee, Darin; Nasab, Omid; Sobota, Maggie; Westerfield, Evan; Cermak, John; Inglis, Sonja; Meuti, Michael; Parker, John; Baird, Chris; Dozeman, Douglas; Dunning, Michael; McGaffey, Karen; Schneider, Mark; Watson, Scott Michael  
**Subject:** GP et al. v. NCR Corporation et al.: GP Responses to IP's discovery requests  
**Attachments:** img-201020755.pdf; img-201020811.pdf



img-201020755.pdf (703 KB)



img-201020811.pdf (117 KB)